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August 18, 1995

**BY HAND DELIVERY**

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

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AUG 18 1995

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

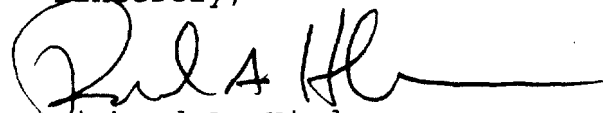
Re: Ex Parte Submission in PR Docket 89-  
553, GN Docket 93-252 and PP Docket  
93-253

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(2), Geotek Communications, Inc. ("Geotek"), by its attorneys, hereby submits an original and two copies of the attached letter from John Egidio of Geotek to Amy Zoslov as a follow-up to a meeting on August 16, 1995 with the FCC's Wireless Bureau. Geotek filed an Ex Parte letter concerning the meeting on August 17, 1995.

If you have any questions regarding this matter, please contact the undersigned.

Sincerely,



Richard A. Hindman  
Counsel for Geotek  
Communications, Inc.

Attachment  
cc: Amy Zoslov

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AUG 18 1995

August 17, 1995

Ms. Amy Zoslov  
Federal Communications Commission  
Wireless Bureau  
2025 M Street NW  
Room 5322  
Washington D.C. 20554

Re: Ex Parte Filing  
PR Docket No. 89-553  
GN Document 93-252  
900 MHz SMR Auctions

Dear Ms Zoslov,

As we discussed in our meeting yesterday, Geotek Communications believes that a bidding increment of \$.02 per megahertz pop is excessive when compared to the cost of DFA licenses in the past. Based upon a 5% incremental equivalent, the value of the frequency to be auctioned would have to equal \$.40 per megahertz pop. In light of the fact that the DFA is indeed the population and business heart of the MTA, the value paid for the DFA should be a guide to the value of the MTA. To this end, I have analyzed 107 of Geotek's 900Mhz acquisitions. The cumulative price paid for these 1070 channels was \$.1176 per pop, which translates to \$.03 per megahertz pop. Using the 5% equivalency, the incremental bid should actually be \$.0015 per MHZ pop.

Geotek proposes a figure that is more equitable to all bidders of \$ .0025 per megahertz pop. Geotek also believes that the fairness of this number, given the facts upon which it is based, is such that the reduced incremental bid amount should be used to determine the upfront deposit amount as well. This would both provide consistency and ensure that the deposit amount is in line with the minimum bid acceptable for all rounds after the first as it was in the other auctions. To assist you in your evaluation, I have attached a summary of the incremental bid amounts by MTA for incremental bids of \$.0025, \$.0050 and \$.02. Per megahertz pop.

Geotek appreciates the FCC's evaluation of its recommendation and is hopeful that this information convinces the FCC staff that equity can best be served with deposits and bid increments of \$.0025 per megahertz pop.

Very truly yours

A handwritten signature in black ink, appearing to read "John Egizio", written in a cursive style.

John Egizio  
Senior Vice President Operations

CC: Gregory Rosston - Auctions Division  
Dan Phythyon - Wireless Division

MTA	Pop	MHz/POP(.25 * .02)	MHz/POP(.25 * .005)	MHz/POP(.25 * .0025)
New York City/Hartford	26,410,597	\$132,053	\$33,013	\$16,507
Los Angeles/San Diego	19,145,232	\$95,726	\$23,932	\$11,966
Chicago	12,069,700	\$60,349	\$15,087	\$7,544
San Francisco/Oakland	11,891,177	\$59,456	\$14,864	\$7,432
Detroit	10,001,009	\$50,005	\$12,501	\$6,251
Charlotte/Greensboro	9,752,317	\$48,762	\$12,190	\$6,095
Dallas/Ft. Worth	9,694,157	\$48,471	\$12,118	\$6,059
Boston/Providence	9,452,712	\$47,264	\$11,816	\$5,908
Philadelphia	8,927,748	\$44,639	\$11,160	\$5,580
W.D.C./Baltimore	7,777,875	\$38,889	\$9,722	\$4,861
Atlanta	6,942,084	\$34,710	\$8,678	\$4,339
Minneapolis/St. Paul	5,986,039	\$29,930	\$7,483	\$3,741
Tampa/Orlando	5,417,788	\$27,089	\$6,772	\$3,386
Houston	5,190,849	\$25,954	\$6,489	\$3,244
Miami/Ft. Lauderdale	5,136,581	\$25,683	\$6,421	\$3,210
Cleveland	4,945,749	\$24,729	\$6,182	\$3,091
New Orleans/B. Rouge	4,925,269	\$24,626	\$6,157	\$3,078
Cincinnati/Dayton	4,716,665	\$23,583	\$5,896	\$2,948
St. Louis	4,683,928	\$23,320	\$5,830	\$2,915
Milwaukee	4,541,432	\$22,707	\$5,677	\$2,838
Pittsburgh	4,102,766	\$20,514	\$5,128	\$2,564
Denver	3,880,637	\$19,403	\$4,851	\$2,425
Richmond/Norfolk	3,846,210	\$19,231	\$4,808	\$2,404
Seattle	3,827,175	\$19,136	\$4,784	\$2,392
Puerto Rico	3,623,846	\$18,119	\$4,530	\$2,265
Phoenix	3,510,140	\$17,551	\$4,388	\$2,194
Memphis/Jackson	3,465,226	\$17,326	\$4,332	\$2,166
Birmingham	3,244,076	\$16,220	\$4,055	\$2,028
Portland	3,059,948	\$15,300	\$3,825	\$1,912
Indianapolis	3,017,475	\$15,087	\$3,772	\$1,886
Des Moines	3,006,139	\$15,031	\$3,758	\$1,879
San Antonio	2,986,524	\$14,933	\$3,733	\$1,867
Kansas City	2,913,304	\$14,567	\$3,642	\$1,821
Buffalo/Rochester	2,777,046	\$13,886	\$3,471	\$1,736
Salt Lake City	2,573,372	\$12,867	\$3,217	\$1,608
Jacksonville	2,274,933	\$11,375	\$2,844	\$1,422
Columbus	2,145,561	\$10,728	\$2,682	\$1,341
El Paso/Albuquerque	2,113,880	\$10,569	\$2,642	\$1,321
Little Rock	2,051,667	\$10,258	\$2,565	\$1,282
Oklahoma City	1,877,478	\$9,387	\$2,347	\$1,173
Spokane/Billings	1,863,335	\$9,317	\$2,329	\$1,165
Nashville	1,767,391	\$8,837	\$2,209	\$1,105
Knoxville	1,721,911	\$8,610	\$2,152	\$1,076
Omaha	1,659,273	\$8,296	\$2,074	\$1,037
Wichita	1,124,174	\$5,621	\$1,405	\$703
Honolulu	1,108,229	\$5,541	\$1,385	\$693
Tulsa	1,096,396	\$5,482	\$1,370	\$685
Alaska	550,043	\$2,750	\$688	\$344
Guam	176,000	\$880	\$220	\$110
American Samoa	47,000	\$235	\$59	\$29
TOTAL	248,953,071	\$1,245,000	\$311,191	\$155,596
August 17 1995				